Delta Diablo Sanitation District

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May 30, 2008 (corrected date)

Via Facsimile No. (916) 651-9563

Ms. Delores Brown
Office of Environmental Compliance
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236

Via Facsimile No. (916) 978-5528

Ms. Patti Idlof
Bureau of Reclamation
2800 Cottage Way, MP–150
Sacramento, CA 95825

SUBJECT: COMMENTS ON NOTICE OF PREPARATION AND NOTICE OF INTENT FOR THE BAY DELTA CONSERVATION PLAN ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL IMPACT STATEMENT

Dear Ms. Brown and Ms. Idlof:

The Delta Diablo Sanitation District (DDSD) submits this letter in response to the March 17, 2008 Notice of Preparation and Notice of Intent to prepare an Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) for the Bay Delta Conservation Plan (BDCP).

DDSD is located at the western edge of the statutory Delta and provides sewage treatment services to a population of approximately 200,000, as well as provides recycled water service to two major power plants that have a capacity to serve over 1 million homes. DDSD's Strategic Plan gives priority to the development of long term sustainable resource development projects that further the District's commitment to progressive environmental stewardship. To that end, the District has taken a leadership role in securing a federal partnership for seven new recycle water projects in the Bay Area. The recent authorization signed by the President includes two projects in the District's service area that will deliver recycled water to two golf courses and seven city parks. In addition, the District is taking a lead role in the development of a biosolids to energy project that is envisioned to provide an alternative biosolids disposal option that will process biosolids into a green renewable energy supply for the Bay Area.

DDSD recognizes that there likely is not one individual solution that will adequately address the environmental challenges that the Delta faces. All solutions should be explored, including re-operations; decreasing water supply obligations through conservation, water transfers, and recycling;

increased storage; engineered solutions to redirect flows, etc. One solution that should be included in the planning and environmental review of the BDCP is the development of a new water supply from the western part of the Delta. Such a water supply could help relieve the Delta of its water supply obligations, as well as allow precious upstream reservoir releases to flow through the Delta prior to diversion.

Over the past three years, the District has completed feasibility level studies on locating a new fish friendly, high quality water supply project within the DDSD service area. The project would divert water out of one or more of the existing water supply intakes owned by others within the District's service area, and utilize advanced treatment to convert the brackish water from the western part of the Delta into a high quality water supply for urban or agricultural purposes. The District is located within an industrial corridor and has several publicly owned assets that could be utilized in the development of a new water supply project, including land and outfall capacity. The studies are in the process of being shared with the local water agencies. DDSD understands that at least one of the agencies, Dublin San Ramon Services District (DSRSD), has sent a scoping letter in with a request to include a western Delta brackish water supply in BDCP planning and environmental review process. This letter outlines the conclusions of the studies completed to date, and invites further exploration of a new water supply project that could provide direct relief of the Delta water supply obligations shared by the state and federal projects.

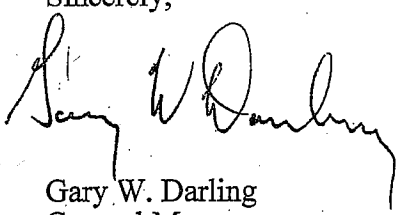
The feasibility level studies the District has completed include a fisheries study and a technical feasibility study that includes cost estimates (copies are available upon request). The studies provide the following conclusions:

1) Location of a brackish desalination plant in the western portion of the Delta costs only a third in terms of energy and dollar costs compared to developing a desalination project in the San Francisco Bay or the Pacific Ocean. The main reason this is true is because the salinity fluctuations are a third or less than the other two water sources (i.e., the TDS in the western Delta ranges from 500 mg/l to 14,000 mg/l, while the Bay and Ocean TDS are 30,000 mg/l). Depending on the partners investing in the project, the cost to construct and operate a project varies from approximately $500/ acre-foot to $900/ acre-foot.
2) The water from a brackish water desalination facility can be treated to any level desired, from bottled water quality for human consumption to a very much improved low salinity water supply for agricultural purposes. Generating and utilizing a high quality, low salinity water source helps to decrease the salinity levels in outfalls and/or runoff.
3) A new intake in the western part of the Delta can be operated in a fish friendly way by installing state-of-the-art fish screens, and avoiding pumping periods when protected aquatic species cannot be adequately screened (i.e., during the egg and larvae stage).
4) Brine disposal is feasible in the western portion of the Delta by exporting the brine further to the west where salinity levels raise dramatically as the Delta empties into the Bay (i.e., a desalination project does not add mass, but does increase concentration).

5) A brackish desalination project is scalable in the western portion of the Delta and could be considered as a supplemental water supply for the Bay Area, or a water supply component for other water users of the State and Federal water projects. Preliminary capital cost estimates (completed in 2006) indicate that a five million gallon per day (MGD) project could be constructed for approximately $25 million, a 50 MGD project for $250 million, up to a million acre-foot/year project for $3.5 billion. A major benefit of a brackish desalination project in the western Delta is that it is drought proof, and requires no new storage.
6) While Bay or ocean desalination projects are considered energy intensive, brackish desalination projects use much less energy. For example, the energy required to treat brackish waters in the western Delta, plus the pumping required to deliver the water to Southern California is less than an ocean desalination and delivery project located in Southern California.
7) A brackish desalination project located in the western portion of the Delta is in close proximity to major water conveyance facilities owned by Bay Area water utilities (approximately one mile), and could be used to deliver water to over five million Bay Area residents. In addition, the western Delta water supply is located approximately 20 miles from the state and federal pumping facilities.

Thank you for this opportunity to comment on the BCDP EIR/EIS process. DDSD will continue to monitor the process and encourages a local, state, and/or federal partnership to develop a new water supply from the western Delta. Please do not hesitate to call me at (925) 756-1920.

Sincerely,



Gary W. Darling
General Manager

GWD:dj

cc: DDSD Board of Directors
Bert Michalczyk, Dublin San Ramon Services District
Jill Duerig, Zone 7
Terry Erlewine, State Water Contractors
William Rohwer, Mid Pacific Region, USBR
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Chron File